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Request GRANTED. Plaintiff shall move for default judgment no later than **August 12, 2025.** 

Dated: July 30, 2025

New York, New York

Jernifer Kochon

SO ORDERED.

JENNIFER L. ROCHON United States District Judge

Writer's email: michael@fishertaubenfeld.com

Writer's direct dial: (212) 384-0258

July 29, 2025

## **VIA ECF**

Honorable Jennifer L. Rochon United States District Court Southern District of New York 500 Pearl St. New York, NY 10007

Re: Hernandez v. Auto Perfection Associates, Inc. et al

1:25-cv-00767-JLR

## Dear Judge Rochon:

This office represents Plaintiff in the above-captioned matter. We write to respectfully request a two (2) week extension, from July 29, 2025 to August 12, 2025, to file Plaintiff's motion for default judgment. The reason for this request is that undersigned counsel requires additional time to finalize the moving papers. This is the first request for an extension of this deadline.

We thank the Court for its attention in this matter.

Respectfully submitted,

/s/ Michael Taubenfeld, Esq.